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PATENT APPLICATION

ATTORNEY DOCKET NO. 10008209-1IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Shell S. Simpson

Confirmation No.: 5675

Application No.: 09/874,427

Examiner: Greg C. Bengzon

Filing Date: Jun. 4, 2001

Group Art Unit: 2144

Title: Dynamic Production Device Representation In A Distributed Environment

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450TRANSMITTAL OF APPEAL BRIEFTransmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on Feb. 13, 2006.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐ (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:☐ 1st Month
\$120☐ 2nd Month
\$450☐ 3rd Month
\$1020☐ 4th Month
\$1590☐ The extension fee has already been filed in this application.☐ (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$ 500 . At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.

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Date of facsimile: Apr. 13, 2006

Typed Name: Jack H. McKinney

Signature: 

Respectfully submitted,

Shell S. Simpson

By: 

Jack H. McKinney

Attorney/Agent for Applicant(s)

Reg No. : 45,685

Date : Apr. 13, 2006

Telephone : (208) 433-1991

Rev 10/05 (ApIBrief)

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\$1590☐ The extension fee has already been filed in this application.☐ (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

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Telephone : (208) 433-1991

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**PATENT APPLICATION
DOCKET NO. 10008209-1**

**IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE**

INVENTOR(S): Shell S. Simpson, et al. **GROUP ART UNIT:** 2144

SERIAL NO.: 09/653,224 **EXAMINER:** Greg C. Bengzon

FILED: 6/4/2001

SUBJECT: DYNAMIC PRODUCTION DEVICE REPRESENTATION
IN A DISTRIBUTED ENVIRONMENT

APPELLANTS'/APPLICANTS' OPENING BRIEF ON APPEAL

1. REAL PARTY IN INTEREST.

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holding, LLC.

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2. RELATED APPEALS AND INTERFERENCES.

There are no other appeals or interferences known to Appellants, Appellants' legal representative or the Assignee which will affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

3. STATUS OF CLAIMS.

Claims 1-8, 11, and 14-37 are pending. All pending claims are appealed.

4. STATUS OF AMENDMENTS.

No amendments have been filed after the final action was entered. All previous amendments have been entered.

5. SUMMARY OF CLAIMED SUBJECT MATTER.

Claim 1 recites a method for representing production devices on a network. That method includes hosting an interface for one or more production devices where each interface has user accessible controls for selecting production options for a target document. See, e.g., Specification, paragraphs [0041]-[0043]. The interface for a selected one of the production devices is provided to a client upon receipt from the client of a production request for the target document. See, e.g., Specification, paragraphs [0041]-[0043]. Production of the target document for the selected production device is managed using production options selected through the interface. See, e.g., Specification, paragraph [0043].

Claim 7 is directed to a method for representing production devices on a network. That method includes detecting new production devices connected to the network. See, e.g., Specification, paragraphs [0040]-[0041] and Fig. 6. Using production logic for each detected device, an interface is generated having user accessible controls for selecting production options for and directing production of a document on that detected production device. See, e.g., Specification, paragraphs [0040]-[0041] and Fig. 6. The generated interface for each production device is hosted. See, e.g., Specification, paragraphs [0041]-[0043]. The interface for a particular production device is provided to a client upon receipt from the client of a production request for a target document. See, e.g., Specification, paragraphs [0041]-[0043]. The production of the target document for the particular production device is

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managed using production options selected through the interface. *See, e.g.*, Specification, paragraphs [0041]-[0043].

Claim 8 is directed to a method for managing electronic document production over a computer network. That method includes a proxy service receiving a production request. *See, e.g.*, Specification, paragraphs [0027]-[0032], [0041]-[0043] and Figs. 2 and 3. The proxy service returns an interface having user accessible controls for identifying a target document and for selecting production options for the target document. *See, e.g.*, Specification, paragraphs [0027]-[0032], [0041]-[0043] and Figs. 2 and 3. The proxy service receives identification of a target document and production options selected through the user interface. *See, e.g.*, Specification, paragraphs [[0027]-[0032], [0041]-[0043] and Figs. 2 and 3. The proxy service manages production of the identified target document for the production device using production options selected through the interface. *See, e.g.*, Specification, paragraphs [0027]-[0032], [0041]-[0043] and Figs. 2 and 3.

Claim 16 is directed to a computer program product for managing electronic document production over a computer network. The product comprises a computer useable medium having computer readable instructions. Those instructions include instructions for receiving, from a client, a production request for a production device for a target document. *See, e.g.*, Specification, paragraphs [0027]-[0032], [0041]-[0043] and Figs. 2 and 3. The medium includes instructions for, in response to the production request, returning to the client an interface for the production device, the interface having user accessible controls for selecting production options for the target document. *See, e.g.*, Specification, paragraphs [0027]-[0032], [0041]-[0043] and Figs. 2 and 3. The medium also includes instructions for managing the production of the target document using production options selected through the interface. *See, e.g.*, Specification, paragraphs [0027]-[0032], [0041]-[0043] and Figs. 2 and 3.

Claim 22 is directed to a system for representing production devices on a network. That system includes a database, an interface generator, and a production engine. *See, e.g.*, Specification, paragraphs [0027]-[0036] and Figs. 2-5. The database contains production logic for one or more production devices. the production logic for each production device includes data for generating a user interface having particular controls for selecting production options. *See, e.g.*, Specification, paragraphs [0027]-[0036] and Figs. 2-5. The interface generator is operable to access production logic for a production device in the database and, following receipt of a production request for a target document, to serve an interface for the production

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device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. That interface, generated according to the accessed production logic, has user accessible controls for selecting production options for the target document. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The production engine is in electronic communication with the interface generator and is operable to manage production of the target document for the production device using production options selected through the interface. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5

Claim 28 is directed to a system for representing production devices on a network. That system includes a database, a device locator, an update service, an interface generator, a plan generator, and a device driver. The database contains production logic for one or more production devices. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The production logic for each production device includes data for generating a user interface having particular controls for selecting production options. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The device locator is operable to detect and identify new devices present on the network. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The update service is operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The interface generator is operable to access the production logic for a production device in the database and to serve an interface for the production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. That interface is generated to include user accessible controls for selecting production options for a document as specified by the production logic for that production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The plan generator is operable to merge the document with production options selected through the interface. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The device driver operable to deliver the production plan to the production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5.

Claim 29 is directed to a system for managing electronic document production over a computer network. The system includes one or more production devices, a client, and a proxy service. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The client is operable to identify a target document, to select one of the one or more production devices, and to direct a production request to the selected

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production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The proxy service is in electronic communication with the client and the production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The proxy service is operable to return, in response to receiving a production request, to the client an interface for selecting production options for the selected production device and to manage the production of the target document for the selected production device using production options selected through the interface. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5.

Claim 35 is directed to a system for managing electronic document production over a computer network. The system includes one or more production devices, a database, a device locator, an update service, a client, an interface generator, a plan generator, and a device driver. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The database contains production logic for one or more production devices. The production logic for a given production device includes data for generating a user interface having particular controls for selecting production options for that production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The device locator is operable to detect and identify new devices present on the network. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The update service is operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The client is operable to identify a target document, to select one of the one or more production devices, and to direct a production request to the selected production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The interface generator is operable to access the production logic for the selected production device in the database and serve an interface for the selected production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The interface is generated to include user accessible controls for selecting production options for the target document as specified by the production logic for that production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The plan generator is operable to acquire the target document and merge it with production options selected through the interface forming a production plan. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5. The device driver is operable to deliver the production plan to the production device. See, e.g., Specification, paragraphs [0027]-[0036] and Figs. 2-5.

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6. GROUNDS FOR REJECTION TO BE REVIEWED.

A. Levine does not teach or suggest a method that includes providing an interface for a selected one of the production devices to a client upon receipt from the client of a production request for the target document.

B. Levine does not teach or suggest generating, using production logic for each detected device, an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device.

C. Levine fails to teach or suggest a proxy service returning an interface having user accessible controls for identifying a target document and for selecting production options for the target document.

D. Levine fails to teach or suggest an interface generator operable to access production logic for a production device in the database and, following receipt of a production request for a target document, to serve an interface for the production device, the interface, being generated according to the accessed production logic, having user accessible controls for selecting production options for the target document.

E. Levine fails to teach a proxy service that is operable, in response to receiving a production request, to return to a client an interface for selecting production options for a selected production device for the selected production device.

F. Levine and Goodman fail to teach or suggest an interface generator operable to access the production logic for a production device in the database and serve an interface for the production device, the interface being generated to include user accessible controls for selecting production options for a document as specified by the production logic for that production device.

7. ARGUMENT.

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A. Ground For Rejection A (Claims 1-7, 16-21, 36, and 37) – Levine does not teach or suggest a method that includes providing the interface for a selected one of the production devices to a client upon receipt from the client of a production request for the target document.

Rejections Under 35 U.S.C. § 102

The Examiner rejected Claims 1-8, 11, 15-22, 24-27, 29-34, and 36-37 under Section 102 citing U.S. Patent 5,974,234 issued to Levine.

Levine teaches a proxy server (107A) that can provide a client with a web page containing information regarding a printer. Levine. Col. 10, lines 22-57 and col. 13, lines 21. That information can includes "site settable" information for the printer and a job queue. Levine, col. 10, lines 50-57. Based on user input entered through the provided web page, the proxy server directs job management commands. Levine, col. 10, line 58 through col. 11, line 5. Job management commands regard jobs in a print queue. Levine's job management commands are limited to commands that affect jobs already in a queue. These include commands for holding and releasing a job, canceling a job, and moving a job within the queue. Levine. Col. 14, lines 45-49 and col. 15, line 63 through col. 16, line 33.

Claims 1-6 and 36: Claim 1 is directed to a method for representing production devices on a network. Claim 1 recites the following acts.

1. hosting an interface for one or more production devices, each interface having user accessible controls for selecting production options for a target document;
2. providing the interface for a selected one of the production devices to a client upon receipt from the client of a production request for the target document; and
3. managing the production of the target document for the selected production device using production options selected through the interface.

To summarize, Claim 1 recites, upon receipt of a production request for a target document, the provision of an interface having controls for selecting production options

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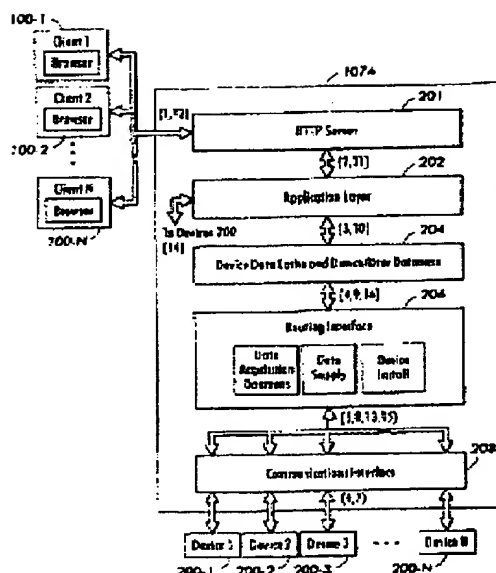
for a selected production device and then managing the production of the target document for that production device using production options selected through that interface.

In a prior response, the Applicant argued that Levine failed to teach the second act of providing the interface and the third act of managing the production of the target document. In the current office action, the Examiner responded with the following contentions:

1. In Column 11 Lines 5-20 Levine described a communications interface.
2. In Column 15 Lines 45-65 Levine described an API for issuing job management commands using function calls and Get/Set operations.
3. In Column 9 Lines 55 -65 Levine described a Mark Service and a User Interface associated with the printer device.
4. In Column 13 Lines 15-20 Levine disclosed retrieving a web page for the particular printing device and returning the page to the client.
5. Thus Levine disclosed an interface upon receipt of a production request for a target document and managing the target document using production options selected through the interface.

The communication interface (208) described by Levine, column 11, lines 5-20 is a programmatic interface and is NOT an "interface having user accessible controls for selecting production options for a target document" as recited by Claim 1. Moreover, Levine's communication interface (208) is never exposed to a client. Levine, Fig. 5 is reproduced below to help illustrate.

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With respect to the Examiner's second contention, Levine's API (206) interacts with Levine's communication interface (208) to implement a requested "get" or "set" operation. Such is irrelevant with respect the act of "providing the interface" recited by Claim 1.

With respect to the Examiner's third contention, Levine's mark service (132) and user interface (134) are also is irrelevant with respect the act of "providing the interface" recited by Claim 1. Levine's user interface (134) is a physical user interface provided on a printing device (12) and cannot be provided to a client.

With respect to the Examiner's fourth contention, Levine does teach sending of web pages containing requested information to client (sol. 13, lines 6-24). Levine also teaches receiving data from those clients (col. 13, lines 25-40). Levine however does **NOT** teach or suggest providing a web page "for a selected one of the production devices to a client upon receipt from the client of a production request for the target document" as recited by Claim 1.

The Examiner's fifth contention is mistaken. As clarified above, Levine does **NOT** disclose providing "an interface upon receipt of a production request for a target document" where that interface includes user accessible controls for selecting production options for the target document as recited by Claim 1.

Simply stated, Levine mentions nothing of providing an interface upon receipt of a production request for a target document where that interface includes user

accessible controls to selecting production options for the target document. For at least these reasons, Claim 1 is patentable over Levine. Claims 2-6 and 36 are also patentable over Levine based at least on their dependency from Claim 1.

Claim 7: Claim 7 is directed to a method for representing production devices on a network. As amended, Claim 7 includes the following combination of elements.

1. detecting new production devices connected to the network;
2. using production logic for each detected device, generating an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device;
3. hosting the generated interface for each production device;
4. providing the interface for a particular production device to a client upon receipt from the client of a production request for a target document; and
5. managing the production of the target document for the particular production device using production options selected through the interface.

Claim 7 requires providing an interface upon receipt of a production request for a target document and then managing the production of the target document using production options selected through the interface. As made clear above with respect to Claim 1, Levine does not teach these elements.

For at least these reasons, Claim 7 is patentable over Levine.

Claims 16-21 and 37: Claim 16 is directed to a computer program product for managing electronic document production over a computer network. As amended, the product includes a computer useable medium having computer readable instructions for the following:

1. receiving, from a client, a production request for a production device for a target document;
2. in response to the request, returning to the client an interface for the production device, the interface having user accessible controls for selecting production options for the target document;
3. managing the production of the target document using production options selected through the interface.

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As above with respect to Claim 1, Levine mentions nothing of returning a user interface in response to a production request for a target document where the user interface includes controls for selecting production options for the target document. Levine also does not teach managing production of a target document using production options selected through that interface. For at least these reasons, Claim 16 is patentable over Levine. Claims 17-21 and 37 are also patentable over Levine based at least on their dependency from Claim 16.

B. Ground For Rejection B (Claim 7) – Levine does not teach or suggest generating, using production logic for each detected device, an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device.

The Examiner rejected Claims 1-8, 11, 15-22, 24-27, 29-34, and 36-37 under Section 102 citing U.S. Patent 5,974,234 issued to Levine.

Claim 7: Claim 7 is directed to a method for representing production devices on a network. As amended, Claim 7 includes the following combination of elements.

1. detecting new production devices connected to the network;
2. using production logic for each detected device, generating an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device;
3. hosting the generated interface for each production device;
4. providing the interface for a particular production device to a client upon receipt from the client of a production request for a target document; and
5. managing the production of the target document for the particular production device using production options selected through the interface.

The Examiner is mistaken in asserting that Levine, col. 14 lines 25-35 and col. 15, lines 45-65 teach the act of generating an interface as recited in Claim 7. That act requires that an interface be generated using production logic for a detected device. The generate interface must have user accessible controls for selecting production options for that detected device. The passages cited by the Examiner mention

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nothing of the use of production logic let alone the use of production logic to generate an interface that has user accessible controls.

C. Ground For Rejection C (Claims 8, 11, 14, and 15) – Levine fails to teach or suggest a proxy service returning an interface having user accessible controls for identifying a target document and for selecting production options for the target document.

The Examiner rejected Claims 1-8, 11, 15-22, 24-27, 29-34, and 36-37 under Section 102 citing U.S. Patent 5,974,234 issued to Levine.

Claims 8, 11, 14 and 15: Claim 8 is directed to a method for managing electronic document production over a computer network. As amended, Claim 8 includes the following combination of elements.

1. a proxy service receiving a production request;
2. the proxy service, returning an interface having user accessible controls for identifying a target document and for selecting production options for the target document;
3. the proxy service receiving identification of a target document and production options selected through the user interface; and
4. the proxy service managing production of the identified target document for the production device using production options selected through the interface.

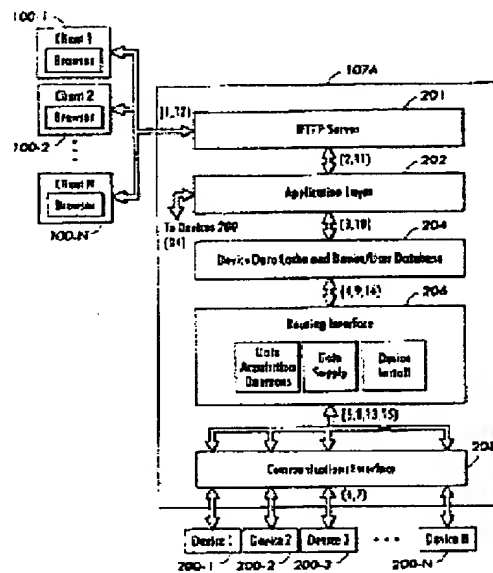
In a prior response, the Applicant pointed out that Levine mentioned nothing of providing a user interface that includes controls for identifying a target document. The Examiner responded with the following contentions;

1. In Column 11 Lines 5-20 Levine described a communications interface,
2. while in Column 15 Lines 45-435 Levine described an API for issuing job management commands using function calls and Get/Set operations.
3. In Column 9 Lines 55 -65 Levine described a Mark Service and a User Interface associated with the printer device.

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4. In Column 13 Lines 15-20 Levine disclosed retrieving a web page for the particular printing device and returning the page to the client.

With respect to the first contention, the communication interface (208) described by Levine, column 11, lines 5-20 is a programmatic interface and is **NOT** an “interface having user accessible controls for identifying a target document and for selecting production options for the target document” as recited by Claim 8. Moreover, Levine’s communication interface (208) is never exposed to a client in a manner that would enable it to provide user accessible controls to a client. Levine, Fig. 5 is reproduced below to help illustrate.



With respect to the Examiner’s second contention, Levine’s API (206) interacts with Levine’s communication interface (208) to implement a requested “get” or “set” operation. Such is irrelevant with respect to the act of “returning the interface” recited by Claim 8.

With respect to the Examiner’s third contention, Levine’s mark service (132) and user interface (134) are also irrelevant with respect to the act of “providing the interface” recited by Claim 1. Levine’s user interface (134) is a physical user interface provided on a printing device (12) and cannot be returned to a client.

With respect to the Examiner's fourth contention, Levine does teach sending of web pages containing requested information to client (sol. 13, lines 6-24). Levine also teaches receiving data from those clients (col. 13, lines 25-40). Levine however does **NOT** teach or suggest providing a web page that includes user accessible controls for identifying a target document as recited by Claim 8.

Simply stated, Levine mentions nothing of returning an interface that includes user accessible controls for identifying a target document. For at least these reasons, Claim 8 is patentable over Levine. Claims 11, 14, and 15 are also patentable over Levine based at least on their dependency from Claim 8.

D. Ground For Rejection D (Claims 22-27) – Levine fails to teach or suggest an interface generator operable to access production logic for a production device in the database and, following receipt of a production request for a target document, to serve an interface for the production device, the interface, being generated according to the accessed production logic, having user accessible controls for selecting production options for the target document.

The Examiner rejected Claims 1-8, 11, 15-22, 24-27, 29-34, and 36-37 under Section 102 citing U.S. Patent 5,974,234 issued to Levine.

Claims 22-27: Claim 22 is directed to a system for representing production devices on a network. As amended, Claim 22 includes the following combination of elements:

1. a database containing production logic for one or more production devices, the production logic for each production device including data for generating a user interface having particular controls for selecting production options;
2. an interface generator operable to access production logic for a production device in the database and, following receipt of a production request for a target document, to serve an interface for the production device, the interface, being generated according to the accessed production logic, having user accessible controls for selecting production options for the target document; and

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3. a production engine, in electronic communication with the interface generator, the production engine operable to manage production of the target document for the production device using production options selected through the interface.

Levine simply fails to an interface generator that is operable in the manner recited in Claim 22. That is, Levine fails to teach an interface generator that is operable to:

1. access production logic for a production device in the database and,
2. following receipt of a production request for a target document;
 - a. to serve an interface for the production device, the interface,
 - b. being generated according to the accessed production logic,
 - c. having user accessible controls for selecting production options for the target document.

In support of the rejection, the Examiner simply states "The Examiner respectfully disagrees with the Applicant regarding user interfaces for reasons stated above." Those reasons relate to the same mistaken contentions the Examiner made with respect to Claim 1. Consequently, the Examiner is mistaken with respect to Claim 22.

For at least these reasons, Claim 22 is patentable over Levine. Claims 23-27 are also patentable over Levine based at least on their dependency from Claim 22.

E. Ground For Rejection E (Claims 29-34) – Levine fails to teach a proxy service that is operable, in response to receiving a production request, to return to a client an interface for selecting production options for a selected production device for the selected production device.

The Examiner rejected Claims 1-8, 11, 15-22, 24-27, 29-34, and 36-37 under Section 102 citing U.S. Patent 5,974,234 issued to Levine.

Claims 29-34: Claim 35 is directed to a system for managing electronic document production over a computer network. As amended Claim 35 includes the following combination of elements.

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1. one or more production devices;
2. a client operable to identify a target document, select one of the one or more production devices, and direct a production request to the selected production device;
3. a proxy service in electronic communication with the client and the production device, the proxy service operable to return, in response to receiving a production request, to the client an interface for selecting production options for the selected production device and to manage the production of the target document for the selected production device using production options selected through the interface.

Levine simply fails to teach a proxy service that is operable, in response to receiving a production request, to return to a client an interface for selecting production options for a selected production device for the selected production device.

In support of the rejection, the Examiner simply states "The Examiner respectfully disagrees with the Applicant regarding user interfaces for reasons stated above." Those reasons relate to the same mistaken contentions the Examiner made with respect to Claim 1. Consequently, the Examiner is mistaken with respect to Claim 29.

For at least these reasons, Claim 29 is patentable over Levine. Claims 30-34 are also patentable over Levine based at least on their dependency from Claim 29.

F. Ground For Rejection F (Claims 28 and 35) – Levine and Goodman fail to teach or suggest an interface generator operable to access the production logic for a production device in the database and serve an interface for the production device, the interface being generated to include user accessible controls for selecting production options for a document as specified by the production logic for that production device.

The Examiner rejected Claims 14, 23, 28, and 35 under Section 103 as being unpatentable over Levine in view of U.S. Patent 6,757,071 issued to Goodman.

Claim 28: Claim 28 is directed to a system for representing production devices on a network. Claim 28 recites the following combination of elements.

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1. a database containing production logic for one or more production devices, the production logic for each production device including data for generating a user interface having particular controls for selecting production options;;
2. a device locator operable to detect and identify new devices present on the network;
3. an update service operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic;
4. an interface generator operable to access the production logic for a production device in the database and serve an interface for the production device, the interface being generated to include user accessible controls for selecting production options for a document as specified by the production logic for that production device;
5. a plan generator operable to merge the document with production options selected through the interface; and
6. a device driver operable to deliver the production plan to the production device.

As clarified with respect to Claim 22, Levine and Goodman fail to an interface generator that is operable in the manner recited in Claim 28. That is, Levine fails to teach an interface generator that is operable to:

1. access production logic for a production device in the database and,
2. following receipt of a production request for a target document;
 - a. to serve an interface for the production device, the interface,
 - b. being generated according to the accessed production logic,
 - c. having user accessible controls for selecting production options for the target document.

For at least this reason, Claim 28 is patentable over Levine and Goodman.

Claim 35: Claim 35 is directed to a system for managing electronic document production over a computer network and like Claims 22 and 28 recites an interface generator that is operable to:

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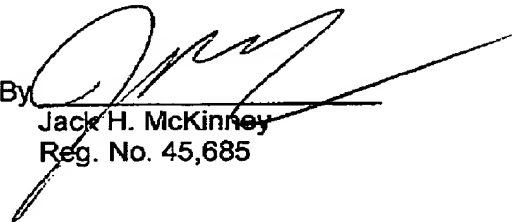
1. access production logic for a production device in the database and,
2. following receipt of a production request for a target document;
 - a. to serve an interface for the production device, the interface,
 - b. being generated according to the accessed production logic,
 - c. having user accessible controls for selecting production options for the target document.

For at least the same reasons Claim 28 is patentable, so is Claim 35

For the reasons set forth above, Claims 1-8, 11, and 14-37 are patentable over the cited references and are in condition for allowance.

Respectfully submitted,
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APPENDIX OF CLAIMS INVOLVED IN THE APPEAL

1. (previously presented) A method for representing production devices on a network, the method comprising:

hosting an interface for one or more production devices, each interface having user accessible controls for selecting production options for a target document;

providing the interface for a selected one of the production devices to a client upon receipt from the client of a production request for the target document; and

managing the production of the target document for the selected production device using production options selected through the interface.

2. (original) The method of Claim 1, further comprising detecting new production devices connected to the network, and hosting an interface for each new production device.

3. (previously presented) The method of Claim 2, further comprising:

acquiring production logic for each detected production device, the production logic including data for generating a user interface having particular controls for selecting production options for that detected production device;

using the production logic for each detected device, generating an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device; and

associating the generated interface with a network address.

4. (original) The method of Claim 3, wherein the act of acquiring comprises identifying the new device and acquiring production logic for the identified device from a device information service.

5. (original) The method of Claim 1, wherein each interface is a web page associated with a network address, the act of hosting comprises hosting each interface on a web server, and the act of providing comprises providing the interface to a web browser.

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6. (original) The method of Claim 1, wherein the interface is hosted and production of the document is managed on a device other than the production device.

7. (previously presented) A method for representing production devices on a network, the method comprising:

- detecting new production devices connected to the network;
- using production logic for each detected device, generating an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device;
- hosting the generated interface for each production device;
- providing the interface for a particular production device to a client upon receipt from the client of a production request for a target document; and
- managing the production of the target document for the particular production device using production options selected through the interface.

8. (previously presented) A method for managing electronic document production over a computer network, the method comprising:

- a proxy service receiving a production request;
- the proxy service, returning an interface having user accessible controls for identifying a target document and for selecting production options for the target document;
- the proxy service receiving identification of a target document and production options selected through the user interface; and
- the proxy service managing production of the identified target document for the production device using production options selected through the interface.

9. (cancelled).

10. (cancelled)

11. (original) The method of Claim 8, wherein the proxy service includes a web server and the interface is a web page; and the act of returning includes returning the web page.

12. (cancelled)

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13. (cancelled)

14. (original) The method of Claim 8, wherein the act of managing includes merging the document with the selected production options into a production plan and delivering the production plan in a device-understood format to the production device.

15. (original) The method of Claim 8, wherein the proxy service operates on a device other than the production device.

16. (previously presented) A computer program product for managing electronic document production over a computer network, the product comprising a computer useable medium having computer readable instructions thereon for:

receiving, from a client, a production request for a production device for a target document;

in response to the production request, returning to the client an interface for the production device, the interface having user accessible controls for selecting production options for the target document;

managing the production of the target document using production options selected through the interface.

17. (original) The product of Claim 16, further comprising instructions for acquiring a target document and wherein the instructions for returning and managing comprise instructions for returning an interface for selecting production options for the target document and managing production of the target document.

18. (original) The product of Claim 16, further comprising instructions for detecting new production devices and generating an interface for each new production device detected.

19. (original) The product of Claim 16, further comprising instructions for identifying each new production device detected and acquiring production logic used to generate an interface for that production device.

20. (original) The product of Claim 19, wherein the instructions for acquiring the production logic comprise instructions for acquiring the production logic from a device information service.

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21. (original) The product of Claim 16, wherein the instructions for receiving and managing comprise instructions for receiving and managing to be executed by a device other than the production device.

22. (previously presented) A system for representing production devices on a network, comprising:

a database containing production logic for one or more production devices, the production logic for each production device including data for generating a user interface having particular controls for selecting production options;

an interface generator operable to access production logic for a production device in the database and, following receipt of a production request for a target document, to serve an interface for the production device, the interface, being generated according to the accessed production logic, having user accessible controls for selecting production options for the target document; and

a production engine, in electronic communication with the interface generator, the production engine operable to manage production of the target document for the production device using production options selected through the interface.

23. (original) The system of Claim 22, wherein the production engine includes: a plan generator operable to merge the document with the production options selected through the interface; and

a device driver operable deliver the production plan to the production device.

24. (original) The system of Claim 22, further comprising a service engine operable to detect new production devices and to acquire production logic for each the detected production device.

25. (original) The system of Claim 24, wherein the service engine includes: a device locator operable to detect and identify new devices present on the network; and

an update service operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic.

26. (original) The system of Claim 22, wherein the interface generator is a web server and the interface is a web page.

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27. (original) The system of Claim 22, wherein the interface generator and the production engine each operate on a device other than the production device.

28. (previously presented) A system for representing production devices on a network, comprising:

- a database containing production logic for one or more production devices, the production logic for each production device including data for generating a user interface having particular controls for selecting production options;;

- a device locator operable to detect and identify new devices present on the network;

- an update service operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic;

- an interface generator operable to access the production logic for a production device in the database and serve an interface for the production device, the interface being generated to include user accessible controls for selecting production options for a document as specified by the production logic for that production device;

- a plan generator operable to merge the document with production options selected through the interface; and

- a device driver operable to deliver the production plan to the production device.

29. (previously presented) In a computer network, a system for managing electronic document production over a computer network, the system comprising:

- one or more production devices;

- a client operable to identify a target document, select one of the one or more production devices, and direct a production request to the selected production device;

- a proxy service in electronic communication with the client and the production device, the proxy service operable to return, in response to receiving a production request, to the client an interface for selecting production options for the selected production device and to manage the production of the target document for the selected production device using production options selected through the interface.

30. (original) The system of Claim 29 wherein the proxy service includes a web server, the interface is a web page, and the client is a web browser.

31. (previously presented) The system of Claim 29, wherein the proxy service includes:

- a database containing production logic for at least one of the one or more production devices, the production logic for a given production device including data for generating a user interface having particular controls for selecting production options for that production device;

- an interface generator operable to access the production logic in the database and serve the interface for the selected production device, the interface being generated according to the production logic for the selected production device; and

- a production engine operable to manage production of the document on the production device in accordance with the selected production options.

32. (original) The system of Claim 29, further comprising:

- a device locator operable to detect and identify new production devices present on the network; and

- an update service operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic.

33. (original) The system of Claim 29 wherein the client operates on a first network device and the proxy service operates on a second network device different from the first network device.

34. (original) The system of Claim 29, wherein the proxy service operates on a device other than the selected production device.

35. (previously presented) In a computer network, a system for managing electronic document production over a computer network, the system comprising:

- one or more production devices;

- a database containing production logic for one or more production devices, the production logic for a given production device including data for generating a user interface having particular controls for selecting production options for that production device;

- a device locator operable to detect and identify new devices present on the network;

an update service operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic;

a client operable to identify a target document, select one of the one or more production devices, and direct a production request to the selected production device;

an interface generator operable to access the production logic for the selected production device in the database and serve an interface for the selected production device, the interface being generated to include user accessible controls for selecting production options for the target document as specified by the production logic for that production device;

a plan generator operable to acquire the target document and merge it with production options selected through the interface forming a production plan; and

a device driver operable deliver the production plan to the production device.

36. (previously presented) The method of Claim 1, wherein each interface has user accessible controls for identifying a target document and for selecting production options for the target document, and wherein managing comprises managing, for the selected production device, the production of the target document identified through the interface using production options selected through the interface.

37. (previously presented) The product of Claim 16, wherein:

the instructions for returning comprise instructions for returning to the client an interface for the production device, the interface having user accessible controls for identifying the target document and for selecting production options for the target document;

the instructions for managing comprise instructions for managing the production of the target document identified through the interface using production options selected through the interface.

Evidence Appendix

There is no extrinsic evidence to be considered in this Appeal. Therefore, no evidence is presented in this Appendix.

Related Proceedings Appendix

There are no related proceedings to be considered in this Appeal. Therefore, no such proceedings are identified in this Appendix.